- (4) Possession of said subject property by plaintiff and his predecessors in title has been actual, open, notorious, and visible, exclusive hostile, and continuous for a period in excess of 20 years prior to the filing of this Complaint.
- (5) That attached hereto as Exhibit B and incorporated herein by reference is the Affidavit of Plaintiff who owned said property from September 24, 1959 until October 16, 1969 and again from September 21, 1975 until the present.
- (6) That attached hereto as Exhibit C and incorporated herein by reference is the Affidavit of Rosie A. Early co-owner of said property from October 16, 1969 until September 21, 1975.
- (7) That attached hereto as Exhibit D and incorporated herein by reference is the chain of title for said property. That the earliest deed in said chain from Ezra C. Baker and Ada Baker to Henry B. Baker and Jean A. Baker dated February 6, 1925 was never recorded and cannot be found so that in order for plaintiff to perfect title in himself this action is filed.
- (8) Plaintiff and his predecessors in title have been assessed by the Department of Assessments and Taxation as the owners of the property described herein.

WHEREFORE, Plaintiff prays:

- (1) That the Court order issuance of an Order of Publication by posting same on a bulletin board in the immediate vicinity of the Courthouse door.
- (2) That the Court grant a judgment quieting title to subject property in Plaintiff.
- (3) And for such other and further relief as the nature of this case may require.

Respectfully submitted,

Clarence R. Earty

FILED

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SALISBURY & SALISBURY
ATTORNEYS AT LAW
FREDERICK, MARYLAND
21701

Tod P. Salisbury
Attorney for Plaintiff
53 East Patrick Street
Frederick, Maryland 21701
(301)694-7235